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Attorneys for Non-Party
VELODYNE LIDAR, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-CV-00939-WHA

**DECLARATION OF ALEKSANDR
KORZH IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Dept: 8, 19th Floor
Judge: Hon. William Alsup

Trial Date: October 10, 2017

1 I, Aleksandr Korzh, declare as follows:

2 1. I am the General Counsel of Velodyne LiDAR, Inc., ("Velodyne"), a third party to
3 the above-captioned matter. I make this declaration in accordance with Civil Local Rule 79-5(e)
4 in support of Plaintiff Waymo LLC's ("Waymo") Administrative Motion to File Under Seal
5 Portions of its Opposition to Defendants' Motion for Summary Judgment ("Motion to Seal").¹

6 2. I have personal knowledge of the facts set forth herein, except as to those stated on
7 information and belief and, as to those facts, I am informed and believe them to be true. If called
8 as a witness, I could and would competently testify to the matters stated herein.

9 3. I have reviewed the Velodyne documents and information that Waymo has sought
10 to file under seal through its Motion to Seal. These Velodyne materials reveal Velodyne's
11 confidential information and trade secrets, including non-public details about Velodyne's
12 products, technology, and manufacturing processes.

13 4. This information has substantial economic value to Velodyne and Velodyne
14 considers it to be highly confidential and competitively sensitive. Velodyne takes significant
15 precautions to ensure that this information is not publically disclosed.

16 5. Publicly disclosing this information could harm Velodyne's competitive standing
17 in the marketplace and could have adverse effects for the company generally. For instance,
18 Velodyne's competitors could use this information to copy Velodyne's technology, thereby
19 avoiding the full research and development costs necessary to develop their own technology.

20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct and that this declaration was executed on September 13, 2017, at San Jose,
22 California.



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24
25 Aleksandr Korzh

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28 ¹ Dkt. 1526.

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